

CAMPAIGN FOR NUCLEAR PHASEOUT

KRISTEN OSTLING

PAGE 1 OF 3



Campaign for Nuclear Phaseout / Campagne contre l'expansion du nucléaire

412-1 rue Nicholas St., Ottawa, Ontario K1N 7B7 Tel: (613) 789-3634 Fax: (613) 241-2292 cnp@web.net

June 28, 1999

U.S. Department of Energy
Office of Fissile Material Disposition
c/o Supplement to SPD EIS
P.O. Box 23786
Washington, DC 20026-3786

To the Office of Fissile Material Disposition:

The enclosed documentation and remarks contained herein are submitted in connection with the Supplement to the Surplus Plutonium Disposition Draft Environmental Impact Statement.

I am writing on behalf of the Campaign for Nuclear Phaseout (CNP), a coalition of Canadian environmental groups concerned with the environmental, economic and strategic impacts of nuclear technology and nuclear power generation. Over 300 organizations representing a diverse cross-section of Canadians have endorsed the Campaign for Nuclear Phaseout. Supporting organizations and individuals reside in every province and territory in Canada.

CNP has a number of concerns related to the plan to import plutonium from American weapons stockpiles into Canada for the purposes of a "test-burn" at Chalk River Laboratories. For the reasons outlined below, it is our position that shipments of MOX fuel to Canada (for the purpose of a test burn or for other reasons) should not be approved. To date, no public consultations have been held in Canada. Additionally, the Government of Canada has not provided a clear explanation of the issues surrounding this project nor has reliable information about the project been made available.

Moreover, the crown corporation, Atomic Energy of Canada Limited (a principle proponent) has frequently provided misinformation on the project. For example, a spokesperson designated to speak on AECL's behalf has stated on numerous occasions (over a period of several months) that the fresh MOX fuel will not contain weapons usable material. This misinformation has gone uncorrected by the Government of Canada.

According to the 1997 DoE Environmental Assessment for the Parallellex Project Fuel Manufacture and Shipment, "environmental assessment of activities conducted in Canada would be the responsibility of the Canadian government". Repeated requests for such an assessment have gone unanswered by the Government of Canada.

There are also significant cost issues associated with the MOX plan in Canada. The four Bruce "A" reactors, which have been identified by AECL as the reactors which would eventually use MOX fuel are at present non-operational and their refurbishment will require a large capital investment. There has been no indication as to how repairs will be financed.

Concerns in Canada have grown over the MOX fuel plan and the and the Government of Canada's handling of the test burn issue.

1...2

MR017

MR017-1

Parallellex EA

DOE acknowledges the commentor's concerns regarding the importation of U.S. weapons-usable plutonium into Canada for the purposes of a "test-burn" at Chalk River Laboratories. Shipments of a small quantity of MOX fuel from LANL to Canada are part of a separate proposed action, the Parallellex Project; therefore, they are beyond the scope of the proposed action analyzed in this SPD EIS. DOE has prepared an *Environmental Assessment for the Parallellex Project Fuel Manufacture and Shipment* (DOE/EA-1216, January 1999) and FONSI, signed August 13, 1999, on fabrication of the MOX fuel and its transportation to Canada. This EA and FONSI can be viewed on the MD Web site at <http://www.doe-md.com>. As indicated in Section 1.1, while the United States is participating in the Parallellex Project, it is not actively pursuing the CANDU option as part of its plutonium disposition program. If Russia and Canada agree to disposition Russian surplus plutonium in CANDU reactors in order to augment Russia's disposition capability, shipments of the Russian MOX fuel would take place directly between Russia and Canada.

DOE acknowledges the attachment of various documents concerning MOX fuel use in Canada.

Comment Documents and Responses on the Supplement—Canada

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KRISTEN OSTLING
PAGE 2 OF 3

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In October 1996, a private seminar on the plan to use MOX fuel in Canadian civilian reactors was organized by a University of Toronto professor at the request of the Department of Foreign Affairs and others. The seminar included representatives from the Government of Canada who presented the case for MOX imports. It led to the production of a 1997 report and recommendation from Professor Franklyn Griffiths that the project be "consigned to oblivion" because it is "fundamentally flawed".

In December 1998, a Committee of the House of Commons (Standing Committee on Foreign Affairs and International Trade) consisting of members from all parties, including the governing party, recommended that the project be canceled on the grounds that "this option is totally unfeasible". The Government of Canada's subsequent rejection of this recommendation failed to address key issues put forward by intervenors at hearings held by the Committee.

In late March 1999, the Mayor of Sarnia, Ontario (a possible transit point for U.S. MOX shipments destined for Chalk River) expressed concern over the "veil of secrecy" around the project and lack of public consultation by the federal government.

In April 1999, the International Association of Firefighters called for a moratorium on plutonium fuel imports because of uncertainty as to whether their members would be able to handle an accident involving plutonium. Longshore workers at the port of Halifax (a possible entry point for Russian MOX fuel) also expressed concern about how the MOX shipments would be handled in Canada.

In May 1999, mayors of the Great Lakes and Saint Lawrence region passed a joint resolution calling on the governments of Canada and the United States to stop the weapons plutonium fuel plan.

A Presidential Executive Order requires the Department of Energy to implement the principles of environmental justice in its review process (Section 3.6 of the Parallex Environmental Assessment). The Parallex Environmental Assessment noted that the DoE was in the process of finalizing procedures for the implementation of the Executive Order.

In a September 17, 1997 letter to the DoE written in connection with the Parallex EA, CNP noted that while there is no stated requirement for a similar analysis of political impacts outside its borders, the United States has a moral obligation to consider the negative impacts of its actions on countries that it claims as allies. This should particularly be the case when the activities which follow from approval of the Parallex assessment will fundamentally change Canada's status with respect to nuclear weapons materials on its soil.

Despite the lack of formal public consultations, there is growing opposition to the MOX fuel importation plan in Canada. MOX fuel shipments to Canada should not go forward. Canadians have not been consulted on the fundamental policy question as to whether they want their country to become a recipient of weapons plutonium.

Thank you for your attention to this matter.

Sincerely,


 Kristen Ostling
 National Coordinator

encl.

MR017

CAMPAIGN FOR NUCLEAR PHASEOUT
KRISTEN OSTLING
PAGE 3 OF 3

List of enclosures

1. Newspaper clippings on the importation of MOX fuel into Canada
2. Allison Macfarlane & Adam Bernstein, "Canning plutonium: Cheaper and Faster", Bulletin of the Atomic Scientists, May-June 1999.
3. Excerpts from House on Commons, Parliament of Canada, Question Period dealing with the issue of MOX fuel imports.
4. Excerpt from Nova Scotia Legislature (Canada), April 7, 1999 regarding Russian MOX fuel to be shipped through Halifax Harbour.
5. Excerpt from *Canada and the Nuclear Challenge: Reducing the Political Value of Nuclear Weapons for the Twenty First Century*, Report of the Standing Committee on Foreign Affairs and International Trade, December 1998.
6. Franklyn Griffiths, "MOX Experience: The Disposition of Excess Russian and U.S. Weapons Plutonium in Canada", July 1997.
7. "Plutonium Shipments and Burning in the Great Lakes Region", Resolution passed at the International Great Lakes and St. Lawrence Mayors' Conference, May 21, 1999.
8. "Plutonium Shipments Risk Public Safety, Fire Fighters say", International Association of Fire Fighters, Media release, April 26, 1999.
9. "Background information on the weapons usability of MOX fuel: A comparison of claims made by AECL and other sources regarding the weapons usability of MOX fuel", produced by the Campaign for Nuclear Phaseout, June 1999
10. "Ten reasons to just say no to weapons plutonium fuel", produced by the Canadian Coalition for Nuclear Responsibility and the Campaign for Nuclear Phaseout, May 1999
11. "Pressure Intensifies on Government to Halt Plutonium Plan", Campaign for Nuclear Phaseout, Media Release, May 17, 1999.
12. "Environment Groups Slam Government for Pushing Plutonium Imports Under Guise of Disarmament", Campaign for Nuclear Phaseout, Media release, April 22, 1999.

MD017

I strongly oppose the importation of MOX fuel into Canada. I support this with the following reasons. Yours truly,
 Jessie Davies

- 1) The shipment of MOX fuel should not be approved without adequate consultation of the Canadian population; to date, there has been none.
- 2) According to the Pre-Decisional Environmental Assessment from Los Alamos (Sept '97), "environmental assessment of activities conducted in Canada would be the responsibility of the Canadian government"; repeated requests for such an assessment have been refused by the government.
- 3) The Government of Canada has not provided the public with any reliable documentation containing solid information or even a clear explanation of the issues surrounding this project.
- 4) Atomic Energy Canada Limited (the proponent) has frequently given out misinformation on the project; for example, AECL's designated spokesman Larry Shewchuk has stated on numerous occasions (over a period of seven months) that the fresh MOX fuel will not contain weapons usable material. This misinformation has gone uncorrected by the Canadian government.
- 5) In October 1996, a private two-day seminar was organized by Professor Franklyn Griffiths at the urging of AECL and the Government of Canada. It led to a recommendation from Professor Griffiths that the project be "consigned to oblivion" because it is "fundamentally flawed."

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WR006

WR006-1**Parallex EA**

DOE acknowledges the commentor's opposition to the importation of MOX fuel into Canada. Shipments of a small quantity of MOX fuel from LANL to Canada are part of a separate proposed action, the Parallex Project; therefore, they are beyond the scope of the proposed action analyzed in this SPD EIS. DOE has prepared an *Environmental Assessment for the Parallex Project Fuel Manufacture and Shipment* (DOE/EA-1216, January 1999) and FONSI, signed August 13, 1999, on fabrication of the MOX fuel and its transportation to Canada. This EA and FONSI can be viewed on the MD Web site at <http://www.doe-md.com>.

- 6) In December 1998, an all party Committee of the House of Commons unanimously recommended that the project be cancelled; the Government of Canada rejected this recommendation without debate or discussion.
- 7) In April 1999, the International Association of Firefighters called for a moratorium on plutonium fuel imports because of uncertainty as to whether their members would be able to handle an accident involving plutonium.
- 8) A joint resolution was passed in May 1999 by mayors of the Great Lakes and Saint Lawrence region calling on the government of Canada and the United States to stop the weapons plutonium fuel plan.
- 9) All 4 Bruce “A” reactors (named by AECL as the reactors of choice to burn MOX eventually) are shut down and will require large investments of capital to repair – capital which the debt-ridden Ontario utility does not have at its disposal.

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WR006

SIERRA CLUB OF CANADA
ELIZABETH MAY
PAGE 1 OF 11



(Please Note: this letter and the materials which follow were faxed over several days without success to a number provided by the DoE in Washington, (202-488-3158))

June 25, 1999

U.S. Department of Energy
 Office of Fissile Material Disposition
 c/o Supplement to SPD EIS
 P.O. Box 23786
 Washington, DC 20026-3786

via fax: 202-596-2710 (11 pages)
 cc: 202-488-4802 Att. Lynn Dean

To the Office of Fissile Material Disposition:

I am writing in connection with the Supplement to the Surplus Plutonium Disposition Draft Environmental Impact Statement. We ask that the material included in this correspondence be made part of the Supplemental Pu Disposition EIS record. The Sierra Club of Canada is opposed to the planned test burn of American and Russian MOX fuel at Chalk River Laboratories in Canada. Our concerns, which include failure of the Government of Canada to consult the Canadian public and to undertake public assessment of environmental and social impacts have led us to conclude that shipments of MOX fuel to Canada should not proceed.

According to the 1997 Department of Energy Environmental Assessment for Parallelex Project Fuel Manufacture and Shipment, "environmental assessment of activities conducted in Canada would be the responsibility of the Canadian government". As the attached correspondence indicates, the Sierra Club is in the process of attempting to determine whether the Government of Canada plans to undertake an environmental assessment and related measures. To date the government has failed to undertake such an assessment.

However, opposition to the MOX fuel project in Canada amongst those outside the nuclear industry who have examined the proposal is widespread. It includes the Committee of the House of Commons charged with reviewing Canada's nuclear weapons and non-proliferation policy (Standing Committee on Foreign Affairs and International Trade, SCFAIT). The Committee, consisting of members from all parties in the Canadian parliament, including the government party, recommended that the Canadian government not proceed with the plan to burn MOX fuel. The Government of Canada's subsequent rejection of this recommendation failed to address key issues underlying the Committee's conclusion.

An Executive Order of the President of the United States requires the Department of Energy to implement principles of environmental justice in its review process (Section 3.6 of the Parallelex Environmental Assessment). While the United States does not have jurisdictional responsibility with respect to undertaking an environmental assessment in Canada, it does have an international obligation to consider whether principles of environmental justice are being consistently applied on its projects. I would suggest that this is particularly the case when the only formal review of the project to date in Canada (SCFAIT) recommended against continuance of the project's Canadian component.

Sincerely,

Elizabeth May
 Executive Director

412-1 rue Nicholas St., Ottawa, Ontario K1N 7B7 Tel: (613) 241-4611 Fax / te: (613) 241-2292 sierra@web.net

FR015

FR015-1

Parallelex EA

DOE acknowledges the commentor's opposition to the test burn of U.S. and Russian MOX fuel at Chalk River Laboratories. Shipments of a small quantity of U.S. MOX fuel from LANL to Canada are part of a separate proposed action, the Parallelex Project; therefore, they are beyond the scope of the proposed action analyzed in this SPD EIS. DOE has prepared an *Environmental Assessment for the Parallelex Project Fuel Manufacture and Shipment* (DOE/EA-1216, January 1999) and FONSI, signed August 13, 1999, on fabrication of the MOX fuel and its transportation to Canada. This EA and FONSI can be viewed on the MD Web site at <http://www.doe-md.com>.

DOE acknowledges the attachments with questions to various Canadian officials.

SIERRA CLUB OF CANADA
ELIZABETH MAY
PAGE 2 OF 11



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Concerned Citizens of Renfrew County and Area
P.O. Box 981, Pembroke, Ontario K8A 7M5
Tel.: (613) 735-4876 Fax: (613) 735-6444

June 16, 1999

The Honourable Christine Stewart
Minister of the Environment
Terrasses de la Chaudière
10 Wellington Street, 28th floor
Hull, Quebec
K1A 0H3

COPY

Dear Ms. Stewart:

It has been reported that preparations are underway for the United States and Russia to transport MOX fuel (mixed oxide fuel from weapons usable plutonium) to Canada. The preparations arise out of work done in connection with the Parallel Project which involves the testing of MOX fuel in a nuclear reactor located at Chalk River Laboratories in Chalk River, Ontario.

Shipment of MOX fuel from the U.S. into Canada for the purposes of testing (a "test burn") at Chalk River Laboratories is reportedly imminent. It is understood that preparations are also underway to import MOX plutonium into Canada from Russia.

As you are aware, the importation of MOX fuel into Canada for use in Canadian reactors is a matter of considerable public interest. It is of particular interest to people in Canadian communities through which MOX fuel might be transported. Accordingly, we are seeking replies to the following questions:

1. The Minister of Transport stated in the House of Commons on April 26, 1999 that it is up to Transport Canada under the Transportation of Dangerous Goods Act to approve the transportation of plutonium fuel. Will Transport Canada or another agent of the Government of Canada issue (or have they issued) a permit in connection with the pending or current transport of MOX fuel into Canada?
2. How many shipments of MOX fuel from the United States into Canada will take place for the purposes of testing at Chalk River Laboratories?
3. How many shipments of MOX fuel from Russia into Canada will take place for the purposes of testing at Chalk River Laboratories?
4. Which port or ports of entry into Canada will MOX fuel be transported through? On what dates will MOX fuel be transported in Canada?

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SIERRA CLUB OF CANADA
ELIZABETH MAY
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(continued from page 1)

5. Is any department or agency of the Government of Canada providing a subsidy, loan or other form of financial assistance to support the testing?
6. Have the shipping packages to be used as part of the Parallex tests (Model 4H Enriched Fuel Bundle Shipping Package, TNB-0145 Shipping Package or other) been subject to Canadian testing and environmental assessment in connection with the transport of MOX fuel into and through Canada?
7. Has a shipping certificate or other certificate been issued by Transport Canada or another agent of the Government of Canada in connection with the importation into Canada of MOX fuel, for the purposes of a test in a nuclear reactor at Chalk River Laboratories?
8. Has an emergency response plan been submitted in connection with the transport of MOX fuel in Canada?
9. Will an environmental assessment be undertaken in connection with activities related to the Parallex Project or any related ongoing project conducted within Canada, including the transportation of MOX fuel for the purposes of testing at Chalk River Laboratories? What measures are in place to ensure that the safety of Canadians and the environment of Canada are protected?

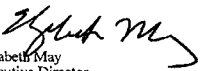
Your cooperation in ensuring that these questions are addressed in an open and publicly accountable fashion would be appreciated.

Sincerely,



Ole Hendrickson
Researcher
Concerned Citizens of Renfrew County and Area

COPY



Elizabeth May
Executive Director
Sierra Club of Canada

SIERRA CLUB OF CANADA
ELIZABETH MAY
PAGE 4 OF 11



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Concerned Citizens of Renfrew County and Area
P.O. Box 981, Pembroke, Ontario K8A 7M5
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June 16, 1999

The Honourable Lloyd Axworthy
Minister of Foreign Affairs
Lester B. Pearson Building
A-10, 125 Sussex Drive
Ottawa, Ontario
K1A 0G2

COPY

Dear Mr. Axworthy:

It has been reported that preparations are underway for the United States and Russia to transport MOX fuel (mixed oxide fuel from weapons usable plutonium) to Canada. The preparations arise out of work done in connection with the Parallex Project which involves the testing of MOX fuel in a nuclear reactor located at Chalk River Laboratories in Chalk River, Ontario.

Shipment of MOX fuel from the U.S. into Canada for the purposes of testing (a "test burn") at Chalk River Laboratories is reportedly imminent. It is understood that preparations are also underway to import MOX plutonium into Canada from Russia.

As you are aware, the importation of MOX fuel into Canada for use in Canadian reactors is a matter of considerable public interest. It is of particular interest to people in Canadian communities through which MOX fuel might be transported. Accordingly, we are seeking replies to the following questions:

1. The Minister of Transport stated in the House of Commons on April 26, 1999 that it is up to Transport Canada under the Transportation of Dangerous Goods Act to approve the transportation of plutonium fuel. Will Transport Canada or another agent of the Government of Canada issue (or have they issued) a permit in connection with the pending or current transport of MOX fuel into Canada?
2. How many shipments of MOX fuel from the United States into Canada will take place for the purposes of testing at Chalk River Laboratories?
3. How many shipments of MOX fuel from Russia into Canada will take place for the purposes of testing at Chalk River Laboratories?
4. Which port or ports of entry into Canada will MOX fuel be transported through? On what dates will MOX fuel be transported in Canada?

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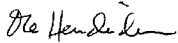
SIERRA CLUB OF CANADA
ELIZABETH MAY
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5. Is any department or agency of the Government of Canada providing a subsidy, loan or other form of financial assistance to support the testing?
6. Have the shipping packages to be used as part of the Parallex tests (Model 4H Enriched Fuel Bundle Shipping Package, TNB-0145 Shipping Package or other) been subject to Canadian testing and environmental assessment in connection with the transport of MOX fuel into and through Canada?
7. Has a shipping certificate or other certificate been issued by Transport Canada or another agent of the Government of Canada in connection with the importation into Canada of MOX fuel, for the purposes of a test in a nuclear reactor at Chalk River Laboratories?
8. Has an emergency response plan been submitted in connection with the transport of MOX fuel in Canada?
9. Will an environmental assessment be undertaken in connection with activities related to the Parallex Project or any related ongoing project conducted within Canada, including the transportation of MOX fuel for the purposes of testing at Chalk River Laboratories? What measures are in place to ensure that the safety of Canadians and the environment of Canada are protected?

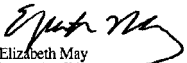
Your cooperation in ensuring that these questions are addressed in an open and publicly accountable fashion would be appreciated.

Sincerely,



Ole Hendrickson
Researcher
Concerned Citizens of Renfrew County and Area

COPY



Elizabeth May
Executive Director
Sierra Club of Canada

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ELIZABETH MAY
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Concerned Citizens of Renfrew County and Area

P.O. Box 981, Pembroke, Ontario K8A 7M5
Tel.: (613) 735-4876 Fax: (613) 735-6444

June 16, 1999

Dr. Agnes Bishop
President
Atomic Energy Control Board
280 Slater Street, 4th floor
Ottawa, Ontario
K1A 0S4

COPY

Dear Dr. Bishop:

It has been reported that preparations are underway for the United States and Russia to transport MOX fuel (mixed oxide fuel from weapons usable plutonium) to Canada. The preparations arise out of work done in connection with the Parallex Project which involves the testing of MOX fuel in a nuclear reactor located at Chalk River Laboratories in Chalk River, Ontario.

Shipment of MOX fuel from the U.S. into Canada for the purposes of testing (a "test burn") at Chalk River Laboratories is reportedly imminent. It is understood that preparations are also underway to import MOX plutonium into Canada from Russia.

As you are aware, the importation of MOX fuel into Canada for use in Canadian reactors is a matter of considerable public interest. It is of particular interest to people in Canadian communities through which MOX fuel might be transported. Accordingly, we are seeking replies to the following questions:

1. The Minister of Transport stated in the House of Commons on April 26, 1999 that it is up to Transport Canada under the Transportation of Dangerous Goods Act to approve the transportation of plutonium fuel. Will Transport Canada or another agent of the Government of Canada issue (or have they issued) a permit in connection with the pending or current transport of MOX fuel into Canada?
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4. Which port or ports of entry into Canada will MOX fuel be transported through? On what dates will MOX fuel be transported in Canada?

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SIERRA CLUB OF CANADA
ELIZABETH MAY
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5. Is any department or agency of the Government of Canada providing a subsidy, loan or other form of financial assistance to support the testing?
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Your cooperation in ensuring that these questions are addressed in an open and publicly accountable fashion would be appreciated.

Sincerely,



Ole Hendrickson
 Researcher
 Concerned Citizens of Renfrew County and Area

COPY



Elizabeth May
 Executive Director
 Sierra Club of Canada

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ELIZABETH MAY
PAGE 8 OF 11



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June 16, 1999

COPI

The Honourable David Collenette
Minister of Transport
Place de Ville, Tower C
29th floor, 330 Sparks Street
Ottawa, Ontario
K1A 0N5

Dear Mr. Collenette:

It has been reported that preparations are underway for the United States and Russia to transport MOX fuel (mixed oxide fuel from weapons usable plutonium) to Canada. The preparations arise out of work done in connection with the Parallel Project which involves the testing of MOX fuel in a nuclear reactor located at Chalk River Laboratories in Chalk River, Ontario.

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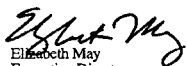
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Sincerely,



Ole Hendrickson
Researcher
Concerned Citizens of Renfrew County and Area



Elizabeth May
Executive Director
Sierra Club of Canada

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P.O. Box 961, Pembroke, Ontario K8A 7M5
Tel.: (613) 735-4876 Fax: (613) 735-6444

COPY

June 16, 1999

The Honourable Ralph Goodale
Minister of Natural Resources
Sir William Logan Building
21st Floor, 580 Booth Street
Ottawa, Ontario
K1A 0E4

Dear Mr. Goodale:

It has been reported that preparations are underway for the United States and Russia to transport MOX fuel (mixed oxide fuel from weapons usable plutonium) to Canada. The preparations arise out of work done in connection with the Parallex Project which involves the testing of MOX fuel in a nuclear reactor located at Chalk River Laboratories in Chalk River, Ontario.

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SIERRA CLUB OF CANADA
ELIZABETH MAY
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7. Has a shipping certificate or other certificate been issued by Transport Canada or another agent of the Government of Canada in connection with the importation into Canada of MOX fuel, for the purposes of a test in a nuclear reactor at Chalk River Laboratories?
8. Has an emergency response plan been submitted in connection with the transport of MOX fuel in Canada?
9. Will an environmental assessment be undertaken in connection with activities related to the Parallex Project or any related ongoing project conducted within Canada, including the transportation of MOX fuel for the purposes of testing at Chalk River Laboratories? What measures are in place to ensure that the safety of Canadians and the environment of Canada are protected?

Your cooperation in ensuring that these questions are addressed in an open and publicly accountable fashion would be appreciated.

Sincerely,



Ole Hendrickson
Researcher
Concerned Citizens of Renfrew County and Area



Elizabeth May
Executive Director
Sierra Club of Canada

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SOCIETY PROMOTING ENVIRONMENTAL CONSERVATION
NORMAN ABBEY
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spec

Society Promoting Environmental Conservation
2150 Maple St., Vancouver, BC V6J 3T3
Phone: (604) 736-7732; Fax: (604) 736-7115
E-Mail: enviro@spec.bc.ca

SINCE 1969 ENVIRONMENTAL ADVOCACY, EDUCATION, AND CONSERVATION

June 26, 1999

U.S. Department of Energy
Office of Fissile Material Disposition
P.O. Box 23786
Washington, DC 20026-3786

VIA FAX: (202)488-3158

Dear Sir/Madame,

Re: "Supplement to the Surplus Plutonium Disposition
Draft Environmental Impact Statement"

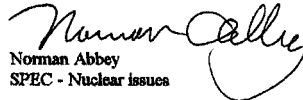
The Society Promoting Environmental Conservation requests that you not approve MOX fuel shipments to Canada. Canadians don't want it and have made the reasons crystal clear to our Government.

In fact an all-party House of Commons Committee that studied this issue recommended unanimously on Dec. 10 1998 that the project was "totally unfeasible." It is unfortunate that our government simply overruled that recommendation without debate, and plans to proceed regardless. The disastrous economic and safety record of the CANDU reactors in which they intend to 'burn' this fuel is further cause for concern.

Environmental assessment of these activities in Canada (as required by the Pre-Decisional Environmental Assessment from Los Alamos, in September, 1997) has not been done, nor has the Canadian government provided reliable information to the public or even explained the issues. On the contrary, government agencies such as AECL have deliberately disseminated misinformation - such as that fresh MOX fuel will not contain weapons usable material. The International Association of Firefighters doubt their ability to handle an accident involving plutonium MOX, and have called for a moratorium. Municipal governments have likewise asked that the project be scrapped. We agree.

Attached is a news release on this issue published in 1998 in Vancouver, by a number of local, national and international groups.

Sincerely,


Norman Abbey
SPEC - Nuclear issues

Enclosed: News Release - "Keep Plutonium Out of Canada" (March 13, 1998)

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Parallex EA

DOE acknowledges the commentor's opposition to MOX fuel shipments to Canada. Shipments of a small quantity of MOX fuel from LANL to Canada are part of a separate proposed action, the Parallex Project; therefore, they are beyond the scope of the proposed action analyzed in this SPD EIS. DOE has prepared an *Environmental Assessment for the Parallex Project Fuel Manufacture and Shipment* (DOE/EA-1216, January 1999) and FONSI, signed August 13, 1999, on fabrication of the MOX fuel and its transportation to Canada. This EA and FONSI can be viewed on the MD Web site at <http://www.doe-md.com>.

DOE acknowledges the attachment of a news release expressing opposition to importing MOX fuel.

Comment Documents and Responses on the Supplement—Canada

**SOCIETY PROMOTING ENVIRONMENTAL CONSERVATION
NORMAN ABBEY
PAGE 2 OF 2**

Nanoose Conversion Campaign

2150 Maple Street, Vancouver, BC, Canada, V6J 3T3 (604)739-0432 Tel/Fax e-mail: conver@alternetvca.com

For release March 13, 1998

KEEP PLUTONIUM OUT OF CANADA

VANCOUVER - "Don't bring nuclear weapons plutonium into Canada!" say BC groups participating in the launch of a global NIX-MOX campaign. They want to stop Ottawa from importing plutonium mixed oxide (MOX) as an experimental fuel for Ontario Hydro's accident plagued Candu reactors. Plutonium is a nuclear bomb ingredient, and one of the most dangerous carcinogens on the planet.

The Women's International League for Peace and Freedom (WILPF-BC), the Nanoose Conversion Campaign (NCC), Veterans Against Nuclear Arms (VANA), and the Canadian Voice of Women for Peace (VOW-BC) will sponsor a plutonium "information vigil" at noon on Mon., Mar. 16 at Robson Square in downtown Vancouver.

Simultaneous news conferences are planned in Ottawa and around the world. Candu reactor exports to Turkey are also being opposed at a separate Mar. 16 news conference in Istanbul.

Prime Minister Jean Chretien intends to begin importing MOX this spring from nuclear weapons labs in Los Alamos, New Mexico. Parliament, however, has yet to debate the matter.

"If it enters Canada, it will never leave", says NCC director Norman Abbey. "Thousands of years from now Canadians may wonder why Chretien couldn't have simply waited a few weeks: until the all-party committee reviewing nuclear policy (including MOX) had completed its report. Pre-empting the process and avoiding debate casts real doubt on the sincerity of this government's very laudable invitation for Canadians to 'comment' on nuclear issues."

The Vancouver vigil organizers advocate proven safe-energy alternatives that don't contribute to nuclear proliferation, and they will distribute a "Nuclear Map of Canada" documenting Canada's extensive participation in the nuclear fuel chain - from Ontario's Chalk River Labs to the Nanoose Bay test range for nuclear submarines in BC.

WILPF, with SECTIONS in 45 countries, was founded at the Hague in 1915. VANA was founded in 1982 during the most dangerous years of the cold war, and the Nanoose Conversion Campaign was formed in 1984 to convert the nuclear submarine facility at Nanoose Bay to peaceful uses.

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More information:

NCC: Norman Abbey, 604-351-1416
WILPF-BC: Silvia McFadyen-Jones, 604-536-3047 or Carolyn Kline, 604-731-4585
VANA: David Morgan, 604-985-7147
Campaign for Nuclear Phaseout: Kristen Ostling, 613-789-3634
Nuclear Map of Canada: http://ccnr.org/atomic_map

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